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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

***IN RE: MIDLAND CREDIT
MANAGEMENT, INC.,
TELEPHONE CONSUMER
PROTECTION ACT
LITIGATION***

} Case No. 11-md-2286-MMA
{ (MDD)
}
Member cases: 10-cv-02261
}
10-cv-02600
}
10-cv-02368
}
10-cv-02370

**DECLARATION OF
CHRISTOPHER ROBINSON
IN SUPPORT OF MOTION
FOR PRELIMINARY
APPROVAL OF CLASS
ACTION SETTLEMENT AND
CERTIFICATION OF
SETTLEMENT CLASS**

Hon. Michael M. Anello
Courtroom:
Date:
Time:

1 I, Christopher Robinson, declare:

- 2 1. I am the named Plaintiff in an action entitled *Robinson v. Midland Funding,*
3 *LLC*, 10-cv-2261 MMA AJB, filed November 2, 2010, that was consolidated
4 into the above captioned Multi-District Litigation class action against
5 Midland Funding, LLC (“Midland Funding”) Midland Credit Management,
6 Inc. (“MCM”) and Encore Capital Group, Inc. (“Encore”) (collectively
7 referred to as “Defendants”). If called as a witness, I would competently
8 testify to the matters herein from personal knowledge. I am filing this
9 declaration in support of our request for the Preliminary Approval of the
settlement.
- 10 2. In that class action, through my counsel, I alleged violation of Section
11 227(b)(3)(B) of the Telephone Consumer Protection Act (“TCPA”), codified
12 at 47 U.S.C. § 227 et seq. That Complaint alleged that Defendant Midland
13 Funding, LLC violated the TCPA by robocalling my cellular telephone, or
14 using an artificial or prerecorded voice, without my prior express consent,
15 while attempting to collect a debt. My case was consolidated with the other
16 Multi-District Litigation (“MDL”) cases for coordinated and consolidated
proceedings in this MDL proceeding.
- 17 3. Plaintiffs have agreed to a class Settlement with Defendants. I have reviewed
18 the Settlement Agreement and have discussed the settlement with my
19 counsel. I believe the settlement is fair and reasonable. I request that the
20 Court approve the settlement.
- 21 4. I am willing to serve as a Class Representative and desire to be appointed as
22 such for purposes of the settlement. I understand the obligations as serving as
23 class representative, have, and will adequately represented the interests of the
24 putative class, and I have retained experienced counsel. I understand my
25 tasks as a class representative and I have participated throughout this
litigation in the belief I was helping all other persons similarly situated.
- 26 5. I understand that my attorneys have requested that the three class
27 representatives be awarded incentive payments of up to a total of \$7,500, at
28

1 \$2,500 each, to be paid from the Settlement Fund. I understand that any such
2 award has to be approved by the Court.

3 6. I also support my attorneys' request to confirm that interim co-lead counsel
4 as appointed by this Court, the Law Offices of Douglas J Campion, APC and
5 Edelman, Combs, Latturner & Goodwin, LLC, be confirmed as Class
6 Counsel to assist in this matter throughout the Final Approval process and
completing the settlement process.

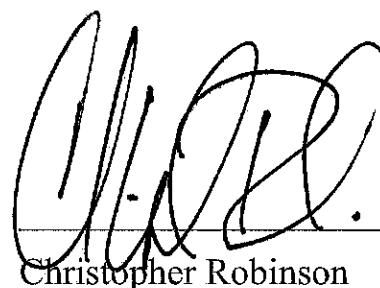
7 7. I am unaware of any legal differences in my status as a Class Member from
8 the other Class Members, nor of any unique factual issues pertaining to such
9 representative status which must be litigated. To my knowledge, I have no
10 conflict with the other Class Members. The claims which I have asserted in
11 the Complaint and the Consolidated Amended Complaint seem to be the
12 same as the claims of the other class members, and my claims relate to the
same issues of law and fact as the other class claims.

13 8. I understand the obligations as serving as class representative, and will
14 continue to adequately represent the interests of the putative class, and I have
15 retained experienced counsel.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed under the laws of the United States on

18 SEPTEMBER 24, 2015 at HENDERSON, ^{NEVADA} California.



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Christopher Robinson